

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JOHN DOE,

Petitioner,

v.

No. 17-cv-2069 (TSC)

MARK T. ESPER,
in his official capacity as ACTING
SECRETARY OF DEFENSE,

Respondent.

**CONSENT MOTION TO HOLD IN ABEYANCE PETITIONER'S BRIEFING
DEADLINE CONCERNING HIS MOTION TO UNSEAL**

Petitioner hereby respectfully moves that the Court hold in abeyance Petitioner's deadline to file a reply brief on his pending motion to unseal. Good cause exists to grant this motion. The parties have reached an agreement in principle that will resolve Petitioner's motion to unseal without the need for further litigation. Both parties will work jointly to finalize this agreement and, as promptly as practicable, to file new versions of the Sealed Filings (ECF Nos. 95, 97, 99, 101, 106, 107, 108, and 111) with agreed-upon redactions. Counsel for Respondent consents to this request.

Accordingly, Petitioner respectfully requests that the Court hold Petitioner's deadline to file his reply brief on the motion to unseal, presently scheduled for today, July 8, 2019, in abeyance until further notice from the parties.

Dated: July 8, 2019

Respectfully submitted,

/s/ Brett Max Kaufman
Brett Max Kaufman (D.D.C. Bar No.
NY0224)

Jonathan Hafetz (D.D.C. Bar No. NY0251)
Anna Diakun
Dror Ladin (D.D.C. Bar No. NY0277)
Hina Shamsi (D.D.C. Bar No. MI0071)
American Civil Liberties Union Foundation
125 Broad Street—18th Floor
New York, New York 10004
T: 212-549-2500
F: 212-549-2654
bkaufman@aclu.org
jhafetz@aclu.org
adiakun@aclu.org
dladin@aclu.org
hshamsi@aclu.org

Arthur B. Spitzer (D.C. Bar No. 235960)
American Civil Liberties Union
of the District of Columbia
915 15th Street, NW, 2nd Floor
Washington, DC 20005
T: 202-457-0800
aspitzer@acludc.org

Counsel for Petitioner

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JOHN DOE,

Petitioner,

v.

No. 17-cv-2069 (TSC)

MARK T. ESPER,
in his official capacity as ACTING
SECRETARY OF DEFENSE,

Respondent.

**[PROPOSED] ORDER GRANTING CONSENT MOTION TO HOLD IN ABEYANCE
PETITIONER'S BRIEFING DEADLINE CONCERNING HIS MOTION TO UNSEAL**

Upon consideration of Petitioner's Consent Motion to Hold in Abeyance Petitioner's Briefing Deadline Concerning His Motion to Unseal, and for good cause shown, the motion is GRANTED. Accordingly, it is ORDERED that Petitioner's deadline will be held in abeyance.

Dated: July ___, 2019

Tanya S. Chutkan
United States District Judge